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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

APR 24 4 39 PM '00 POSTAL PATE COMP JUSTICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSES OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-86-88)

The United States Postal Service hereby provides its responses to the following interrogatories of Douglas F. Carlson: DFC/USPS-86-88, filed on April 10, 2000. Interrogatory DFC/USPS-85 was redirected to witness Kaneer. Objections to interrogatories DFC/USPS-81-84 were filed on April 20, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2999; Fax –5402 April 24, 2000

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF DOUGLAS F CARLSON

DFC/USPS-86. Please refer to the response to DFC/USPS-77(g). If the Postal Service does not know which rate the Commission will recommend and the Governors will approve, how does the Postal Service know that one-cent stamps will satisfy demand from customers who have 33-cent stamps and who may need the equivalent of a "make-up rate" stamp.

RESPONSE:

Although the outcome is unknown, the range of possibilities does seem limited.

Assume a whole-cent basic First-Class Mail rate increase.

Assume that a one-cent stamp can be used for each cent the rate goes up, such that, for instance, 33 + 0 = 33; 33 + 1 = 34; and 33 + 1 + 1 = 35.

Assume that the Postal Service distributes a supply of 1-cent stamps based upon its best estimate of likely demand after review of the recommended decision and past practices.

If one assumes all that, then one should be able to understand the response to DFC/USPS-77(g). Of course, whether or not customer demand for 1-cent stamps is actually satisfied can only be determined by hindsight.

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DFC/USPS-87. Please refer to the response to DFC/USPS-76. Suppose a customer sends an Express Mail article to a post-office box located in a facility whose box lobby is open on Sundays, but the facility does not receive Express Mail on Sunday; rather, Express Mail destined to street addresses in that facility's service area is delivered by the plant or a large post office. The Postal Service guarantees delivery of this Express Mail article on Sunday before the closing time of the box lobby.

- a. If the sender waived the signature requirement and the Express Mail article will fit in the customer's box, will this Express Mail article be delivered to the recipient's post-office box on Sunday? Please explain and provide copies of policies and directives on this subject. Your response should have nationwide application.
- b. If the sender did not waive the signature requirement, will a delivery attempt be made to the recipient's post-office box? Please explain and provide copies of policies and directives on this subject. Your response should have nationwide application.
- c. If the answer to (b) is yes, please confirm that the recipient will not be able to receive the article on Sunday if no staff is working at the facility. If you do not confirm, please explain.
- d. If the answer to (b) is yes, suppose that the recipient's postal facility is staffed on Sundays. Please confirm that the recipient's postal facility may not have a method for customers to contact the staff to pick up Express Mail articles on Sundays. If you do not confirm, please explain.
- e. If no telephone number is listed on the Express Mail label for the recipient and the recipient's box lobby is not open on Sundays, please confirm that the Express Mail article will not be delivered on Sunday in a way that will allow the recipient to receive it on Sunday. If you do not confirm, please explain.

RESPONSE:

As a general note, many post office box lobbies are accessible by customers 24 hours a day, 7 days a week, to allow customers to retrieve any mail contained therein.

However, the lobbies' being open to customer access to the post office boxes is not an indication that the office is staffed on Sundays for the purpose of distributing mail to the boxes, as few offices perform this function on Sundays.

Also, please note that there are no nationwide policies and directives on this subject.

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- a. If the specific office is staffed on Sunday for the purpose of distributing mail into post office boxes and a dispatch of mail (including Express Mail) is received, the Express Mail article would be placed in the box if it would fit and had the signature waiver signed.
- b. If the specific office is staffed on Sunday for the purpose of distributing mail into post office boxes and a dispatch of mail (including Express Mail) is received, a notice announcing the arrival of the Express Mail article would be placed in the box.
- c. If the Express Mail article is addressed to a post office box, and there is no staff working in the facility on Sunday, the intended recipient will not be able to receive the article on Sunday as there would be no one there to provide the service.
- d. If the specific office is staffed on Sunday for the purpose of distributing mail into post office boxes and a dispatch of mail (including Express Mail) is received, on a case by case basis the facility would provide a mechanism for customers to contact the staff for retrieving Express Mail articles which arrived with a Sunday commitment.
- e. Confirmed.

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DFC/USPS-88. Please refer to the response to DFC/USPS-76. Suppose a customer sends an Express Mail article to a rural address — using the format RR 2, Box 100 — served by a facility that does not receive Express Mail on Sunday. Will the plant or large post office have sufficient information about rural routes to determine where RR 2, Box 100 is located, and will this Express Mail article be delivered on Sunday? Please explain and provide copies of policies and directives on this subject. Your response should have nationwide application.

RESPONSE:

There are no nationwide policies and directives on this subject. It is unlikely that the article would be delivered to a rural route address with the format of RR2, Box 100, due to the lack of information you note. It would then be delivered on Monday by the rural route carrier.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Scott L. Reiter

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 April 24, 2000